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IN THE UNITED DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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THE PHILLIES, a Pennsylvania limited
partnership,

PLAINTIFF,
-against- CIVIL ACTION NO.:
1:2019cv07239

HARRISON/ERICKSON, INCORPORATED, a New York
corporation, HARRISON ERICKSON, a partnership,
and WAYDE HARRISON and BONNIE ERICKSON,

DEFENDANTS.

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DATE: February 7, 2020

TIME: 9:39 a.m.

EXAMINATION BEFORE TRIAL of the
Defendant, BONNIE ERICKSON, taken by the
Plaintiffs, pursuant to a Court Order, held at
the offices of Duane Morris LLP, 1540
Broadway, Suite 1400, New York, New York
10036, before Magdalena Mayra Artiles, a
Notary Public of the State of New York.

Magna Legal Services
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11

-AND-

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J. MATTHEW WILLIAMS, ESQ.

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-AND-

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ELAINE NGUYEN, ESQ.

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17 ALSO PRESENT:

18 Executive Vice President, David Buck

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2 of -- I mean, yeah, we had rough
3 sketches for stuff, but none of them
4 were ever fabricated.

5 Q. Understood.

6 A. And it's a shame, because some
7 of the performers did get what we had
8 explained to them in their training,
9 so -- we need to keep this here?

10 Q. Over there. Thank you.

11 You'd agree that both Dave
12 Raymond and Tom Burgoyne were talented
13 performers?

14 MR. MONTCLARE: Objection as
15 to form.

16 A. First of all, yes. I do agree
17 that, but David was an -- not a
18 performer to start with. So we did
19 give him some training. Also, he
20 understood what we were talking about
21 for the character as we described it
22 and what we were looking for, and we
23 had approval of all of these
24 performers. So once we saw what he was
25 able to do, he really fulfilled the

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2 kind of character we wanted and what we
3 described to him.

4 Q. What exactly did you describe to
5 him?

6 A. We talked about how to be --
7 physically how to be in the costume.
8 When he came up for a fitting, we would
9 have him walk around. We told him to
10 take it home, sit with the character,
11 do regular things you would do at home.

12 It's a whole training procedure
13 for performers. Some of the others we
14 auditioned, but he -- he had to dance,
15 so he did know how do dance, which was
16 a good thing, and because we didn't do
17 an audition, it was --we really had to
18 wait and see how he was going to
19 perform, but we approved him
20 ultimately, and then we ran an audition
21 for Tom Burgoyne, who does it now who
22 is also very talented.

23 Q. And then when David Raymond
24 retired from the Phillies you brought
25 him on as part of Acme Mascots,